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**UNITED STATES DISTRICT COURT
DISTRICT OF UTAH**

<p>NOVELLA ATWOOD; CHRISTINE CID; CHERALEE ENGLAND; KATHLEEN GAGON; KRISTEN PUERTAS; JANICE RANDALL; and SARAH TYCHSEN, individually and on behalf of all others similarly situated,</p> <p style="text-align: right;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>DOTDASH MEREDITH,</p> <p style="text-align: right;">Defendant.</p>	<p>STIPULATED MOTION FOR EXTENSION OF TIME</p> <p>Case No. 1:24-cv-00046-AMA-PK</p> <p>Judge Tena Campbell</p> <p>Magistrate Judge Daphne A. Oberg</p>
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STIPULATED MOTION

By and through counsel, Plaintiffs Novella Atwood, Christine Cid, Cheralee England, Kathleen Gagnon, Kristen Puertas, Janice Randall, and Sarah Tychsen (collectively “Plaintiffs”), respectfully file this Stipulated Motion for an Extension of Time for Plaintiffs to respond to Defendant’s Motion to Dismiss the First Amended Complaint, (ECF No. 22) and state as follows:

Relief requested: Plaintiffs request, and Defendant does not oppose, a two-week enlargement of time for Plaintiffs to file their opposition to Defendant’s Motion to Dismiss the

First Amended Complaint (“FAC”). (ECF No. 22). Under DUCivR 7-1(1)(4) Plaintiffs’ opposition is presently due on September 20, 2024.

Grounds: This is a putative class action that alleges that Defendant violated Utah’s Notice of Intent to Sell Nonpublic Personal Information Act, Utah Code Ann. § 13-37-101, *et. seq.* (the “NISNPIA”) by renting, selling, exchanging, and otherwise disclosing Nonpublic Personal Information it obtained through its sales of publications to Utah consumers without first providing consumers notice required under the NISNPIA statute. Defendant’s Motion to Dismiss the FAC (ECF No. 23), filed on August 23, 2024, seeks dismissal of Plaintiffs’ claims on several grounds – that Plaintiffs have failed to allege that Defendant is subject to NISNPIA, that Plaintiffs have failed to allege that Defendant disclosed their information, that Plaintiffs’ claims are barred by the statute of limitations, that Plaintiffs lack Article III standing, and the Court lacks subject matter jurisdiction because NISNPIA bars federal class actions, among other reasons.

Plaintiffs seek, and Defendant does not oppose, an additional two weeks to respond to Defendant’s legal and factual arguments. Counsel requires additional time to prepare an opposition that fully addresses Defendant’s multiple grounds for dismissal and while attending to obligations in other cases. Accordingly, Plaintiffs respectfully request that the Court extend the due date for Plaintiffs’ Opposition to the FAC to October 4, 2024.

Dated: September 20, 2024
/s/ Kristen Rodriguez
Kristen Rodriguez (*Pro Hac Vice*)
(*signed by filing attorney with permission of*
Plaintiff’s attorney)
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Respectfully submitted,
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